

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ORACLE CORPORATION,

Plaintiff,

v.

CHARTIS SPECIALTY INSURANCE
COMPANY,

Defendant.

Civil Action No. 1:18-cv-03440-GHW

**APPLICATION FOR LEAVE TO FILE REDACTED EXHIBIT TO THE
DECLARATION OF DEBORAH HIRSCHORN IN SUPPORT OF DEFENDANT’S
MOTION TO PARTIALLY DISMISS THE COMPLAINT**

For the reasons set forth herein, Defendant AIG Specialty Insurance Company (f/k/a Chartis Specialty Insurance Company) (“AIGSIC”), by and through its undersigned counsel, submits this application seeking leave of this Court, pursuant to Rule 4(A)(ii) of the Court’s Individual Rules of Practice in Civil Cases (the “Court’s Individual Rules”), to file Exhibit 1 to the Declaration of Deborah Hirschorn (“Hirschorn Decl.”) in support of Defendant’s Motion to Partially Dismiss the Complaint (ECF Doc. No. 42-1), with the existing redactions to Exhibit 1 to the Hirschorn Decl., in order to protect sensitive and proprietary information and comply with this Court’s April 30, 2018 Order. *See* ECF Doc. No. 9. Exhibit 1 to the Hirschorn Decl. is an August 18, 2014 reservation of rights letter from AIG to Oracle. Consistent with the Court’s April 30, 2018 Order, AIGSIC seeks to redact the limits of liability of the AIGSIC Excess Policy and Beazley Primary Policy (the “Policies”).

On April 27, 2018, Plaintiff Oracle Corporation sought leave to file the Policies at issue in this litigation with redactions to information revealing premiums and limits of liability. *See* ECF Doc. No. 8. This Court granted that request in an Order dated April 30, 2018, concluding that “[w]eighing the low relevance of the insurance premiums and policy limits to Plaintiff’s claims against the privacy interests of the insurers, the Court finds that the interests of the insurers outweigh the presumption of public access at this stage in the litigation.” *See* ECF Doc. No. 9.

Based on this Court’s April 30, 2018 Order, Defendant respectfully requests leave to file AIG’s August 18, 2014 reservation of rights letter with redactions to the Policies’ limits of liability. Defendant has requested Plaintiff’s consent to this application, in line with the Court’s April 30, 2018 Order, but has not yet received a response to its request.

Dated: New York, NY
July 19, 2018

Respectfully submitted,

BRESSLER, AMERY & ROSS, P.C.

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